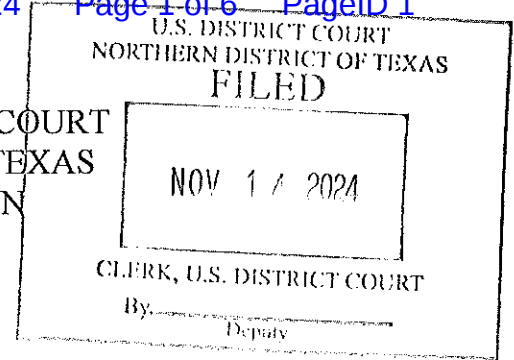


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

KEITH CHARLES OWENS (01)

No. 4:24-MJ-881

CRIMINAL COMPLAINT

I, Special Agent Kurt A. Duross, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On or about October 5, 2024, in the Fort Worth Division of the Northern District of Texas, defendant **Keith Charles Owens**, in an area within a commercial service airport, to wit, Dallas/Fort Worth (DFW) International Airport Terminal A, Gate A36, did knowingly assault L.C., an American Airlines (AA) Gate Agent, who had security duties within the airport, and such assault interfered with the performance of the duties of the employee and lessened the ability of the employee to perform those duties, in violation of 49 U.S.C § 46503.

Applicable Law:

1. Title 49 U.S.C § 46503 provides that an individual in an area within a commercial service airport in the United States who, by assaulting a federal, airport or air carrier employee who has security duties within the airport, interferes with the performance of the duties of the employee or lessens the ability of the employee to perform those duties, shall be fined under Title 18, imprisoned for not more than 10 years, or both. If the individual used a dangerous weapon in committing the assault or

interference, the individual may be imprisoned for any term of years or life imprisonment.

Agent Background:

2. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI). I have been so employed since 2004, and I am currently assigned to the Dallas/Fort Worth (DFW) International Airport Resident Agency, which is a part of the FBI's Dallas Division. My responsibilities include conducting investigations involving federal crimes aboard aircraft as well as federal crimes that occur within the DFW International Airport and Love Field properties. In the course of my career with the FBI, I have participated in the execution of search and arrest warrants, and have been the Affiant of same. The statements set forth in this affidavit are the product of my personal observations, training and experience, as well as information obtained from other law enforcement officers and witnesses. The facts presented are true and correct to the best of my knowledge and belief, but are not inclusive of all the evidence or information involved with this case.

Probable Cause:

3. On October 5, 2024, at approximately 5:20pm I was notified by American Airlines Security personnel of a possible assault on an American Airlines gate agent in Terminal A of the DFW International Airport that occurred on the same day. On Sunday October 6, 2024, a review of American Airlines Closed Circuit Television (CCTV) Cameras from October 5, 2024, at Gate A36, showed a man in a red jersey type shirt with

the number 81 on it, walk up to the gate agent at A36 and grab him around the shoulders and neck and start punching the gate agent in the head.

4. On Monday October 7, 2024, I received an official copy of the DFW Department of Public Safety (DPS) report RMS#24-04334, which identified Keith Charles Owens as the person wearing the red jersey and L.C. as the victim AA gate agent. The report also identified other AA employees who assisted in restraining Owens as well as AA passengers who witnessed the assault. The report indicated Owens was intoxicated at the time of the assault and was arrest by DFW DPS for public intoxication.

5. On Tuesday, October 8, 2024, I received a copy of all DFW DPS CCTV footage for Gate A36. The footage shows Owens bypassing the boarding line at approximately 4:42pm on October 5, 2024, and approaching the A36 ticket scanner. Owens places his ticket on the scanner but it does not scan. L.C. points to Gate A35, indicating Owens is at the wrong gate. Owens walks towards Gate A35, out of the view of the A36 camera.

6. CCTV footage for Gate A35 shows Owens walking onto the jet bridge without scanning his boarding pass. AA personnel stop Owens and have him leave the jet bridge. Owens is visibly upset in the CCTV footage, at one point he aggressively approaches an AA employee behind the ticketing counter. Owens then walks back to Gate A36, out of view of the A35 camera.

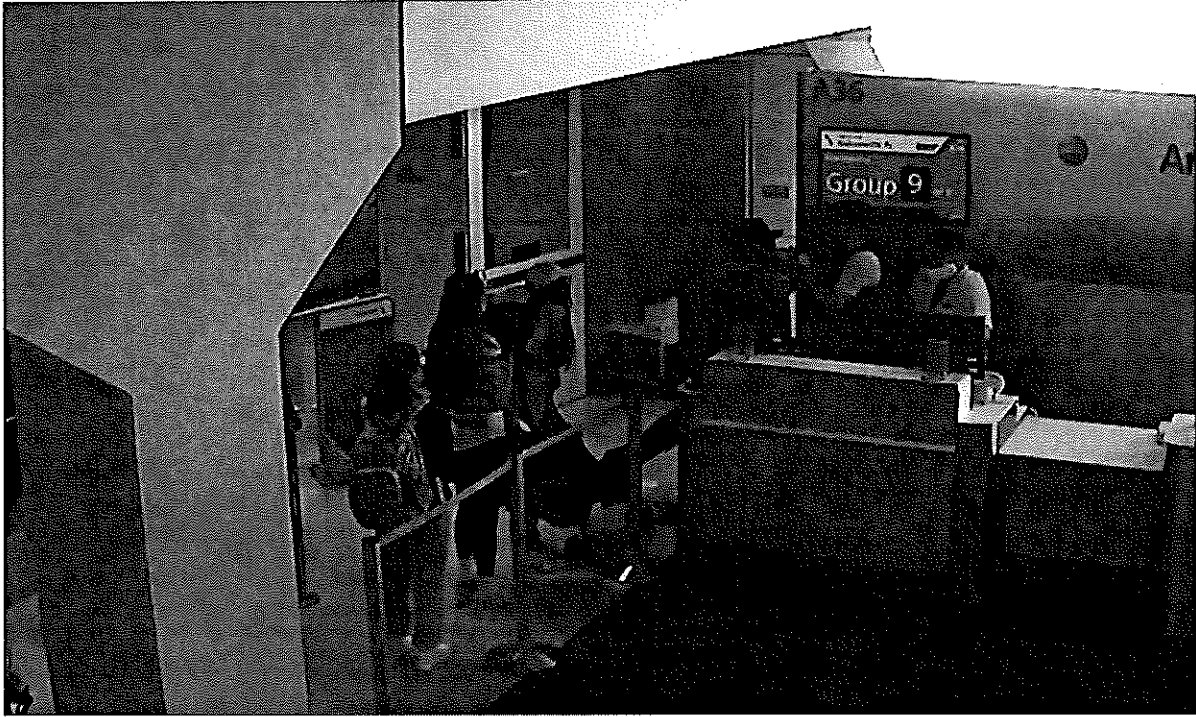
7. At approximately 4:48pm Owens walks directly up to L.C. as L.C. is scanning boarding passes for A36, grabs L.C. by the shoulders and neck, and pushes him back. Owens then punches L.C. several times in the face and neck. L.C. pushes Owens back, at which point Owens falls to the ground and is restrained by other AA personnel.

8. Owens sustained a cut to his left eye brow, scratches on his arm, tenderness to his right cheek and eye and bruising to his arm and chest. Other AA employees sustained injuries as well while responding to help L.C.

9. During an interview of L.C. on October 10, 2024, L.C. was able to confirm the actions shown in the CCTV videos. L.C. further explains that when Owens first approached the boarding area he was upset and saying he was late. L.C. informed him he was at the wrong gate and told him to go to A35 for his flight. Owens cussed at L.C. and walked away. L.C. radioed to A35 that Owens was headed that way and appeared to be intoxicated. L.C. also called for the AA Customer Service Manager to come and assist with Owens. A few minutes later L.C. only remembers Owens yelling at him and then grabbing him. L.C. pushes Owens off of himself and stays back. L.C. received medical treatment at the airport but had to return to the doctor on October 8, 2024, for additional evaluation because his face and side were still hurting.

10. At the time of the assault L.C. was monitoring the boarding of flight AA2449 by scanning boarding passes. Scanning boarding passes is a security duty for AA employees and allows AA to correctly identify whether or not a passenger is on the correct flight. Owens' actions delayed the boarding process for flight AA2449 as well as caused numerous AA employees to be out of work for several days.

11. Below is a screenshot of the CCTV footage showing Owens assault L.C.:



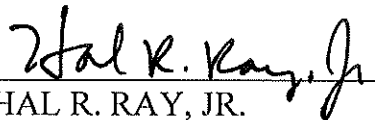
Conclusion:

12. Based upon the above facts and circumstances, I respectfully submit that there is probable cause to believe that **Keith Charles Owens** knowingly interfered with security screening personnel, in violation of 49 U.S.C. § 46503.



Kurt A. Duross
Special Agent
Federal Bureau of Investigation

Sworn to me at 1:29 a.m. (p.m.) in Fort Worth, Texas, on this 14th day of NOVEMBER, 2024.



HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE